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March 18, 2002

**Ex Parte**

William Caton  
Acting Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

*Re: Application by Verizon New England for Authorization To Provide In-Region, InterLATA Services in Vermont, CC Docket No. 02-7*

Dear Mr. Caton:

Verizon provides the following answers to questions raised by the Commission with respect to Verizon's performance measurements.

1. The Commission notes that OR-6-01-3143 (Percent Accuracy – Orders – UNE Platform), was designated as under review for the January 2002 data month in both Vermont and Massachusetts. In February 2002, Verizon discovered that a new algorithm used to take a sample of the manually processed UNE platform orders was not programmed correctly. Verizon has implemented a fix and expects that it will be able to resume reporting this measurement with the March 2002 data month. Verizon notes that the two other OR-6-01 submeasurements — OR-6-01-2000 (Percent Accuracy – Orders – Resale) and OR-6-01-3311 (Percent Accuracy – Orders – Loop/Pre-qualified Complex/LNP) — were not placed under review in January and that Verizon met the 95 percent benchmark standard on both submeasurements in Vermont and Massachusetts in that month.
2. The Commission notes that the January 2002 version of the Vermont Guidelines (App. I, Tab 4) states that the standard for OR-6-03 (long term measure), which Verizon first reported in November 2001, is “not more than 5% of LSRCs resent due to Verizon error,” while the January 2001 version of the Vermont Guidelines (App. I, Tab 2) states that the standard for all OR-6 measurements is “95% of orders without errors.” The

interim and long term versions of OR-6-03 are calculated differently, such that the 95 percent standard was appropriate for the interim measurement, but the equivalent standard of not more than 5 percent is appropriate for the long term measurement. The interim measurement was calculated as follows:

$$\frac{(\text{Number of LSRCs sampled} - \text{LSRCs with errors for specified product})}{(\text{Number of LSRCs sampled})}$$

Thus, under the interim measurement, a higher percentage demonstrated better Verizon performance, indicating that nearly all of the sampled LSRCs had no errors. The long term measurement is calculated as follows:

$$\frac{(\text{Number of LSRCs resent due to error})}{(\text{Number of LSRCs})}$$

Thus, under the long term measurement, a lower percentage demonstrates better Verizon performance, indicating that very few LSRCs were resent due to Verizon error. In fact, for all of the OR-6-03 submeasurements (OR-6-03-2000, OR-6-03-3143, OR-6-03-3311) from November 2001 through January 2002, an average of only about 0.3 percent of LSRCs were resent due to Verizon error in both Vermont and Massachusetts.

The twenty-page limit does not apply as set forth in DA 02-111. Please let me know if you have any questions.

Sincerely,



cc: J. Veach  
J. Stanley  
G. Remondino